

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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PRIME CAPITAL VENTURES, LLC,

Plaintiff,

-against-

REIGN FINANCIAL INTERNATIONAL, INC.,  
GIORGIO JOHNSON, GARY MILLS AND  
MARTIN KARO,

Defendants.

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**NOTICE OF CROSS-MOTION**

Civil Case No.: 1:23-cv-00207  
(FJS/DJS)

**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law; and upon the accompanying Affidavit of Daniel S. L. Rubin, Esq., sworn to on the 21st day of July, 2023, with Exhibit A (proposed Second Amended Complaint) attached thereto; and upon all of the pleadings and prior proceedings had herein, Plaintiff Prime Capital Ventures, LLC, will cross-move this Court, before the Frederick J. Scullin, Jr. at the United States District Court, 100 S. Clinton St., Syracuse, New York at a date and time acceptable to the Court for an Order: (i) pursuant to Rule pursuant to 15(a)(2) of the Federal Rules of Civil Procedure, granting Plaintiff leave to amend its complaint; and (ii) awarding such other and further relief as the Court deems just and proper. Pursuant to Northern District of New York Local Rule 15.1(a), a proposed Second Amended Complaint is filed herewith as Exhibit A to the Affidavit of Daniel S. L. Rubin, Esq., with the proposed changes to the pleading marked with redlines/strikeouts.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the stipulated briefing schedule filed as Docket No. 29 and approved by the Court (Docket No. 30), opposition papers to this cross-motion, if any, are required to be served no later than September 5, 2023.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the stipulated briefing schedule filed as Docket No. 29 and approved by the Court (Docket No. 30), reply papers may be filed in

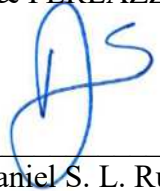
support of this cross-motion, and such papers, if any, are required to be served no later than September 25, 2023.

**REQUEST FOR ORAL ARGUMENT**

Plaintiff joins in Defendants' request for oral argument of Defendants' pending motion to compel arbitration or to dismiss. Plaintiff further requests oral argument on the instant cross-motion because the proposed amendments to Plaintiff's pleading relate, in part, to Defendants' pending motion to dismiss.

Dated: July 21, 2023  
Albany, New York

GIRVIN & FERLAZZO, P.C.

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